



June 28, 2011

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

RE: **Ex parte filing** in CC Docket No. 01-92; WC Docket Nos. 05-337, 07-135 and 10-90; and GN Docket No. 09-51

Dear Ms. Dortch:

On June 27, Steve Merriam from Arctic Slope Telephone Association Cooperative, Dave Dengel from Copper Valley Telephone Cooperative, Inc., Brenda Shepherd from Interior Telephone Company, Inc. and Mukluk Telephone Company, Inc., Alan Pedersen from Waimana Enterprises and I conducted an ex parte meeting with Margaret McCarthy of Commissioner Copps' office. We conducted two similar ex parte meetings today with Christine Kurth of Commissioner McDowell's office and Angela Kronenberg of Commissioner Clyburn's office.

The ex parte meetings consisted of a discussion of the attached documents related to potential rule changes for tribal/native regions. The first document provides a draft of what we believe is the end-game solution set for tribal/native regions by establishing a separate Tribal/Native Broadband Fund (TBF). If the Commission is unable to reach this point at the time of implementing initial National Broadband Plan (NBP) rule changes, we believe it will be necessary to provide a waiver of any potential USF rule changes for carriers operating primarily or wholly in tribal/native territory and we have provided a draft of what that could look like with the second document. We expressed an opinion that by moving away from the identical support paradigm and requiring support to be based on a company's own costs, that the funds available from this change would be much greater than the small incremental funding that could be required for a TBF.

As required by the Commission's rules, this ex parte record is now filed in the above referenced dockets. If there are any questions, please call me on 503.612.4409.

Respectfully submitted,

Via ECFS 6/28/11

Jeffrey H. Smith
Vice-President and Division Manager, Western Region
Chairman of the Board of Directors

Copy to

Angela Kronenberg, Commissioner Clyburn's office
Christine Kurth, Commissioner McDowell's office
Margaret McCarthy, Commissioner Copps' office

Steve Merriam, Arctic Slope Telephone Association Cooperative
Dave Dengel, Copper Valley Telephone Cooperative, Inc.
Brenda Shepherd, Interior Telephone Company, Inc. and Mukluk Telephone Company, Inc.
Alan Pedersen, Waimana Enterprises

Attachments